



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

APR 05 2013

REPLY TO THE ATTENTION OF:  
LR-8J

**CERTIFIED MAIL 7009 1680 000 7669 2595**  
**RETURN RECEIPT REQUESTED**

Mr. Brad Ahbe  
President  
Canton Drop Forge, Inc.  
4575 Southway Street Southwest  
Canton, Ohio 44706

Re: Request for Information  
EPA ID No.: OHD004465142

Dear Mr. Ahbe:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Canton Drop Forge, Inc. (hereinafter "CDF" or "you") to submit certain information relating to CDF's response to EPA's Notice of Violation dated January 22, 2013, and the management and storage of used oil at CDF's facility located at 4575 Southway Street Southwest, Canton, Ohio. We are requiring this information to further evaluate the facility's compliance with RCRA, 42 U.S.C. § 6901 *et seq.*, and its implementing regulations set forth in the Code of Federal Regulations and the authorized Ohio Administrative Code. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the U.S. Environmental Protection Agency, Attention: Brian Kennedy, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

CDF must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the

## **REQUEST FOR INFORMATION**

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

In the following requests, "NOV" refers to EPA's Notice of Violation dated January 22, 2013 and "Response" refers to CDF's response to the NOV dated February 20, 2013.

### **REQUESTS:**

1. In the Response, Section A of NOV Item 2 states that the existing oil-water separator at the south end of Forge Shop Building C was originally equipped with coalescing mesh filters. Due to the significant amount of grit in the oil and process water entering the separator, the filter became plugged and was removed.
  - a. State the date of installation of the existing oil-water separator at the south end of Forge Shop Building C.
  - b. State the date that the coalescing mesh filter was removed from the existing oil-water separator.
  - c. Since the date the original mesh filter was removed, has CDF made any attempts to reinstall the mesh filter in the oil-water separator or to find an alternative method to prevent used oil from entering Ponds #1 and #2? If so, please explain all such attempts and provide corresponding documents.
  - d. Please provide the design specifications and capacity (and all corresponding documents) of the existing oil-water separator.
  - e. Please provide all documents used to determine the necessary design specifications and capacity of the existing oil-water separator.
  - f. Please provide a copy of any regulatory document obtained from the state or local municipality on the design, specification, installation and operation of the existing oil-water separator.
2. In the Response, Section B of NOV Item 2 states that Complete Waste Disposal was contracted to remove the existing used oil from Pond #1. Between August 3 and September 20, 2012, Complete Waste Disposal removed 49,300 gallons of used oil and water from the pond over the course of eight shipments.
  - a. Please provide copies of the eight waste manifests used to ship the used oil from CDF's site to Environmental Specialists for recycling.

- a. Please provide a copy of that report including all analytical results for the constituents mentioned above.
  - b. Please explain all reasons and purposes of CDF's engagement of Hammontree & Associates to complete this report (including all corresponding documents).
6. If not provided in response to a request above, please provide a map of the entire Canton Drop Forge property, including the precise boundaries (prior and present) of the Zone A and Zone B landfills as well as Ponds #1, #2, and #3.
7. Please provide all information and documentation that describes if, at any point in CDF's operating history, waters from Ponds #1, #2, and #3 were ever discharged from CDF's property to the Massillon County publicly owned treatment works or any local waterway.
8. If not provided in response to any of the above requests, please provide a detailed description and corresponding documents of how Ponds #1 and #2 previously and currently comply with RCRA's hazardous waste surface impoundment requirements, as set by the Ohio Administrative Code and the Code of Federal Regulations, including any draft or submitted RCRA permit applications.

**Certification**

5. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.